

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Parker Tirrell, et al.,

Plaintiffs

v.

Frank Edelblut, et al.,

Defendants.

Case No. 1:24-cv-00251-LM-TSM

**MOTION FOR THE ADMISSION, *PRO HAC VICE*,
OF JENNIFER LEVI AS ADDITIONAL COUNSEL FOR
PLAINTIFFS PARKER TIRRELL AND IRIS TURMELLE**

Pursuant to Local Civil Rule 83.2(b), I hereby move for the admission, *pro hac vice*, of Jennifer Levi, an attorney with the law firm of GLBTQ Legal Advocates & Defenders and a member of the bar of the Commonwealth of Massachusetts, as additional counsel for Plaintiff Parker Tirrell, by her parents and next friends Sara Tirrell and Zachary Tirrell, and Plaintiff Iris Turmelle, by her parents and next friends Amy Manzelli and Chad Turmelle. Attorney Levi's affidavit is filed herewith.

WHEREFORE, I respectfully request that this Honorable Court:

- A. Grant this Motion for Admission Pro Hac Vice of Jennifer Levi as additional counsel for Plaintiff Parker Tirrell, by her parents and next friends Sara Tirrell and Zachary Tirrell, and Plaintiff Iris Turmelle, by her parents and next friends Amy Manzelli and Chad Turmelle; and
- B. Grant such other and further relief as may be just and equitable.

Counsel for the defendants assent to the filing of this motion.

Date: August 22, 2024

Respectfully submitted,

/s/ Chris Erchull

Chris Erchull (N.H. Bar. No. 266733)
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Statements Pursuant to Rule 7.1

Chris Erchull, counsel for Plaintiffs, hereby submits this concurrence statement pursuant to Local Rule 7.1(c) in connection with this motion for *pro hac vice* admission, filed August 22, 2024. Counsel for Plaintiffs contacted Defendants' counsel, and they have assented to this motion.

Chris Erchull further states, pursuant to Local Rule 7.1(a)(2) that due to the nature of this Motion a memorandum in support is not being filed herewith.

/s/ Chris Erchull

Chris Erchull

Certificate of Service

I, Chris Erchull, hereby certify that on today's date I served a copy of the forgoing on all counsel by filing the same on ECF.

/s/ Chris Erchull

Chris Erchull

SUPPORTING AFFIDAVIT OF JENNIFER LEVI

I, Jennifer Levi, pursuant to Local Rule 83.2(b)(1), hereby certify that:

1. My office is located at 18 Tremont Street Suite 950, Boston, Massachusetts 02108, and my phone number is (617) 426-1350. My email address is jlevi@glad.org.
2. I am eligible to practice in and a member in good standing of the Bar of the Commonwealth of Massachusetts (1993), and I am a member in good standing of the Bar of Illinois where my status is inactive (1992). I am also presently admitted to and eligible to practice in the following courts: United States District Court for the Northern District of Illinois (1994); United States District Court for the District of Massachusetts 1999); United States Court of Appeals for the First Circuit (2000); United States Tax Court (2006); United States Supreme Court (2015); United States Court of Appeals for the District of Columbia Circuit (2017); United States Court of Appeals for the Eleventh Circuit (2022) (limited to appearance in appeal that resulted in the opinion reported at *Eknes-Tucker v. Governor, of the State of Ala.*, 80 F.4th 1205 (11th Cir. 2023), as set forth in ¶ 6 below).
3. I am not currently suspended in, nor have I been disbarred from any jurisdiction.
4. I have never had any felony or misdemeanor convictions.
5. I also have never been sanctioned for professional misconduct or received any discipline from any court or bar. I am, however, a subject of a pending matter in the U.S. District Court for the Middle District of Alabama in which potential sanctions are at issue. This matter resulted from an investigation initiated by the Alabama federal courts in May 2022, focused on the conduct of 39 lawyers involved in the filing of cases challenging an Alabama law that criminalizes the provision of medical care for transgender

adolescents. Three cases were filed by two non-overlapping groups of attorneys; two of those cases have since been dismissed. The remaining lawsuit challenging the law, in which I am one of the lead attorneys, is ongoing, and I am admitted *pro hac vice* in connection with that case. The sanctions-related proceedings center on the contention that I was allegedly involved in impermissible judge shopping. I have fully cooperated throughout the proceedings. I have consistently denied engaging in any wrongdoing or sanctionable misconduct and believe strenuously in my position. No final determination has been made that concludes that I engaged in any wrongdoing or sanctionable misconduct.

6. In addition, while the investigation of the professional conduct matter was ongoing, I sought admission to the United States Court of Appeals for the Eleventh Circuit to appear in an appeal of the Middle District of Alabama's issuance of a preliminary injunction enjoining the enforcement of the law our team challenged. As I am doing here, I reported to the United States Court of Appeals for the Eleventh Circuit that I was involved in an ongoing matter in the Middle District of Alabama implicating my conduct as an attorney. In light of my disclosure of that matter, the United States Court of Appeals for the Eleventh Circuit denied me admission to that court "at this time" but granted me leave to appear *pro hac vice* in the appeal, which I did.
7. As an officer of the court and a civil rights attorney for over 30 years, I have a deep and abiding belief in justice and rule of law, including a respect for court rules and procedures, all of which I commit to following in this Court. My *pro hac vice* status has never been denied or revoked in any court.

8. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 21st DAY OF AUGUST 2024.

/s/ Jennifer Levi

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